

EX PARTE OR LATE FILED

WILLKIE FARR & GALLAGHER

Washington, DC
New York
London
Paris

June 23, 1997

DOCKET FILE COPY ORIGINAL

RECEIVED

JUN 23 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, DC 20554

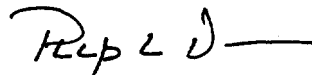
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte Presentation in CC Docket No. 96-98
Implementation of the Local Competition Provisions in
the Telecommunications Act of 1996 and CS Docket No.
95-184, Telecommunications Services Inside Wiring;
Customer Premises Equipment

Dear Mr. Caton:

During the course of a meeting this afternoon with James Casserly and Anita Wallgren of Commissioner Ness' office, David Turetsky and I, on behalf of Teligent, L.L.C., discussed issues raised in Petitions for Reconsideration of the Commission's First Report and Order in CC Docket No. 96-98 concerning access to rights-of-way under Section 224 of the Communications Act as well as issues concerning access to inside wire arising out of the Notice of Proposed Rulemaking in CS Docket No. 95-184. We asked Ms. Wallgren and Mr. Casserly to consider the statutory basis and policy interests recommending an interpretation of Section 224 in a manner that accounts for the unique access requirements of fixed wireless carriers such as Teligent. Our discussion centered upon the expansion of Section 224 in the Telecommunications Act of 1996 and the Commission's construction of utility companies' obligations to afford access to conduits, ducts, and rights-of-way in the Order in CC Docket No. 96-98. We also discussed the jurisdictional and policy basis for requiring building owners to offer carriers access to telephone inside wire.

Respectfully submitted,

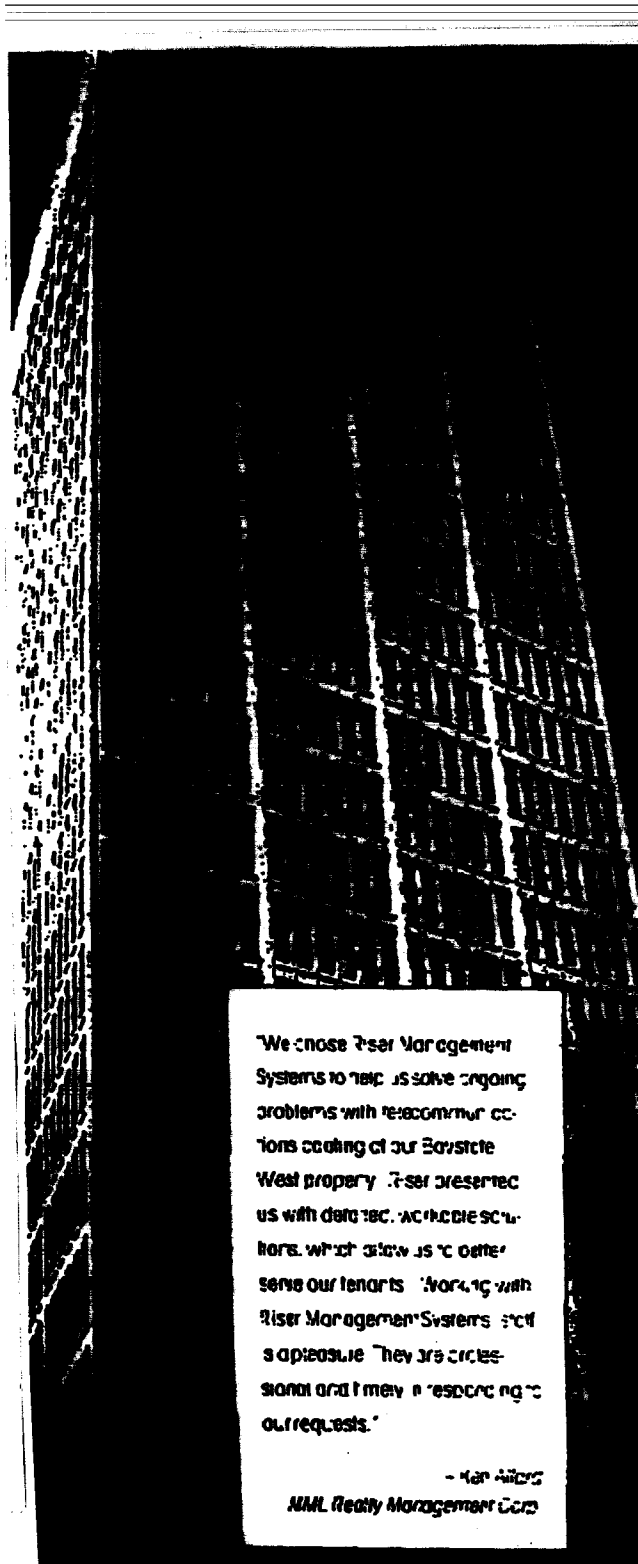


Philip L. Verveer

cc: James Casserly
Anita Wallgren

Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20036-3384
202 328 8000

Telex: RCA 229800
WU 89-2762
Fax: 202 887 8979



"We chose Riser Management Systems to help us solve ongoing problems with telecommunications costing at our Baystate West property. Riser presented us with data, technical solutions, which allow us to better serve our tenants. Working with Riser Management Systems is a pleasure. They are professional and timely in responding to our requests."

- Ken Wilson
NML Realty Management Corp

Riser Management Systems, LP assists building owners and managers in controlling the telecommunications pathways within their buildings and realizing revenue from those pathways. Riser Management Systems partners with building owners and managers to provide comprehensive solutions to the issues surrounding riser closet management. Riser Management Systems turns a situation which is an annoyance into an attractive business opportunity.

The principals of Riser Management Systems have over 30 years experience in Planning, Engineering, and Operations with Interexchange Carriers and Competitive Access Providers. Riser Management Systems provides extensive telecommunications industry contacts and resources, in-depth knowledge of the competitive marketplace, insight into future competitive changes, and a comprehensive understanding of legal and regulatory requirements.

Call 1-800-RISER SYS
(1-800-747-3779)



**Riser
Management
Systems**

P.O. Box 1264
Burlington, Vermont 05402
Fax: 802-860-0395





CHANGE/ COMPETITION

Recent changes in FCC policies mean you now control your inside-building wires.

New competitors to the local telephone company want access to your tenants.

Your "free" riser space has become a valuable commodity for today's new telephone service providers.



A MANAGED RISER SYSTEM

Creates a new monthly revenue source within your buildings.

Increases the desirability of your building to prospective tenants who require intra-building cabling for computer, fax and data services.

Increases the desirability of your building to local, long distance, microwave, radio signal, and data companies.



SIMPLE

A high-capacity "extension cord" allowing easy telephone and data access to your tenants.

Turn-key. Complete design, engineering, construction oversight and ongoing management means immediate access to new telecommunications services.

Splice-free. State-of-the-art cable, with no electronics and low maintenance components.



COMPELLING

Your opportunity to realize substantial new revenue from existing, unmanaged space.

Monthly check, based on volume of usage, paid directly to building management.

Your opportunity to attract more tenants.

Your building's on-ramp to the National Information Superhighway.

